



**DESERT TORTOISE COUNCIL**

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**Via email only**

13 February 2017

To: BLM Hassayampa Field Office  
Attn: James Holden  
21605 North 7<sup>th</sup> Avenue  
Phoenix, AZ 85027  
[jwholden@blm.gov](mailto:jwholden@blm.gov)

RE: Environmental Assessment (EA) for the Lower Centennial Complex

Dear Mr. Holden,

The Desert Tortoise Council (Council) is a non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of this species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council routinely provides information to individuals, organizations, and regulatory agencies on matters potentially affecting the desert tortoise within its geographic range.

We have reviewed the Rangeland Health Evaluation for the Lower Centennial Complex (Evaluation) involving four cattle allotments and offer the following scoping comments to be addressed in the EA. Following a reiteration of information given in the Evaluation, along with a referenced section and/or page number, we provide specific requests and/or questions *in italics* that we expect to be addressed in the EA.

1. We note on page 5 that the Evaluation seeks to determine: 1) if standards are being achieved, not achieved, and, in cases of not achieved, if significant progress is being made towards achievement of land health. 2) Where it is determined that land health standards are not being achieved, determine whether livestock grazing is a significant factor causing that non-achievement. *We ask that the EA clearly document pertinent standards as they pertain to the Sonoran desert tortoise (Gopherus morafkai) and analyze how these standards are being met, or not, for the species. The analysis should be based on existing rangeland health data, and if no such data are available, document the absence of data.*

2. Section 2.3.4. (Page 10) indicates that there is habitat for the Sonoran desert tortoise, including 29,597 acres of Category II Habitat and 14,964 acres of Category III Habitat. Among the various definitions provided on page 10, we note that Category II Habitats consist of 1) Habitat that may be essential to the maintenance of viable populations; 2) Habitat where most conflicts are resolvable; and 3) Habitat that contains medium to high densities of tortoises or low densities contiguous with medium or high densities. Unfortunately, the only four maps in the Evaluation (on pages 33 through 36) do not show the distribution of Category II and III Habitats relative to cattle use areas. *We ask that the EA include maps showing Category II and III Habitats. Additionally, we ask that water sources and other ancillary structures such as corrals that function to concentrate cattle use be mapped relative to Category II and III Habitats. Based on this information, we expect the EA to present and analyze alternatives that show how cattle impacts can be minimized on Category II Habitats, in particular, by closing or moving some facilities and creating new ones to draw cattle away from habitats that may be essential to the maintenance of viable populations.*

3. Page 21 indicates that utilization data were collected at each Key Area using the Key Species method in 2016-2017. *We ask that the EA document the locations of these data collection plots relative to Category II and III Habitats to see if they are appropriate to determine potential impacts to tortoise populations within the Lower Centennial Complex. If none occurs, the EA should identify utilization data plots in Category II and III Habitats.*

4. *The EA should document all available data relative to tortoise distribution and densities, and referencing these data, analyze each alternative in terms of its relative impact on tortoises. If no tortoise population data exist, the BLM in its EA should identify methods for monitoring tortoise populations so that it can determine if applicable standards are being achieved.*

5. On page 14, the Evaluation indicates that Sonoran desert tortoise habitat requirements are listed in the Bradshaw-Harquahala Resource Management Plan (RMP). However, the Evaluation fails to summarize what these requirements are. *We ask that the EA document these habitat requirements and then analyze how the Preferred Alternative, versus other alternatives, does or does not meet the RMP requirements.*

6. As reported in Section 5.1 on page 21, we question the validity of relying on Rangeland Inventory data that were collected in 1981. The paragraph then indicates, “The inventory was used to determine range condition and *apparent trend* [emphasis added] as described in the 1982 Lower Gila North Draft Grazing Environmental Impact Statement.” We contend that a “trend” cannot be established based on one or two years of data, particularly when the data are 36 years old. *The EA must divulge all available data used to analyze impacts to tortoise habitats associated with all alternatives, and in the absence of recent data, describe how BLM intends to implement and commit to new studies and evaluations to document impacts to tortoises.*

7. We appreciate that Section 8.1 indicates that Actual Use reporting will become a non-optional term and condition. *Going forward, we ask that Actual Use reporting, as described in Section 6.1 at the bottom of page 21, be a non-optional term and condition **specifically in Category II and III Habitats**. The EA should indicate how these data will be used to implement management of the allotments that would minimize impacts to tortoises.*

8. We find that the Evaluation's summary of achieved and unachieved standards in Section 7.1 fails to analyze impacts to tortoises in Category II and III Habitats. *The EA must supplement information presented in the Evaluation as it pertains to achieving habitat requirements in the Bradshaw-Harquahala RMP and any other RMPs or other BLM rangeland health standards that are not be referenced in the Evaluation.*

9. The following statement is made on page 29: "In order to reduce grazing pressure near livestock water sources within the complex, any salt or supplement blocks placed on the public lands should be located at least one-quarter of a mile from available water sources, and should be located at least one-eighth of a mile above major drainages." *We ask that the EA prescribe similar requirements relative to Category II Habitats, and that salt and supplemental blocks not be placed in Category II Habitats or any other places where tortoise populations are known to be concentrated.*

10. Unfortunately, the Evaluation does not summarize existing Allotment Management Plans (AMPs). *As such, for full disclosure, we expect that the EA will summarize all pertinent AMPs for the four grazing allotments. Additionally, the EA must include an evaluation of the relevant AMPs to see if they should be revised to better protect public resources, including tortoises and their habitats. A few specific questions include: Would different seasons of grazing use, different stocking rates, different pasture locations, different pasture rotations, and/or different water and salt locations provide better resource protection? Before reaching a decision on whether to renew these grazing permits, the EA analysis must address these questions, and provide a reasonable range of feasible alternative management options for comparison of effects.*

11. *The EA must also consider an alternative where grazing in pastures with tortoises is limited to the tortoise inactive season.*

Herein, we ask that the Desert Tortoise Council be identified as an Affected Interest for this project; that the Environmental Assessment be provided to us for an opportunity to determine how the issues and questions identified herein have been addressed in that document.

Regards,



Edward L. LaRue, Jr., M.S.  
Desert Tortoise Council, Ecosystems Advisory Committee, Chairperson